

ETEXT ATTACHMENT

07/15/2005 21 : 11

July 15, 2005
BY ELECTRONIC DELIVERY

Edward D. Ryan
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Letter dated June 15, 2005, regarding Amended September Monthly Report (8/1/04-8/31/04) filed on May 26, 2005

Dear Mr. Ryan:

On behalf my client, the Republican Party of Louisiana ("the Party"), I am writing in response to the Commission's letter dated June 15, 2005, regarding the Party's Amended September Monthly Report (8/1/04-8/31/04), which it filed on May 26, 2005.

First, the Commission asked for a clarification of the additional receipts listed on the Party's Amended September Monthly Report. From August 5, 2004, through August 23, 2004, the Party transferred a total of \$15,268.06 from its nonfederal account to its federal account. Due to a technical problem with the Party's campaign finance software, the transfer did not appear on the Party's the original September Monthly Report, which was filed on September 20, 2004.

Second, the Commission has asked the Party to clarify all expenditures made for a "Facility Rental" on Schedule B and Schedule H of the Amended September Monthly Report filed on May 26, 2005.

" On Schedule B, the Party's report listed a \$2,000 payment to Barbara Bonnoitt on August 4, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for an office rental. The Party did not rent the facility on behalf of any specifically identified federal candidate.

" On Schedule B, the Party's report listed a \$1,599.28 payment to the Holiday Inn - Holidome on August 11, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for a State Convention. The Party did not rent the facility on behalf of any specifically identified federal candidate.

" On Schedule H4, the Party's report listed a \$1,286 payment to Jacquin Grand Children, LLC on August 5, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for an office rental. The Party did not rent the office on behalf of any specifically identified federal candidate.

" On Schedule H4, the Party's report listed a \$1,925 payment to R&C Properties, LLC on August 5, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for an office rental. The Party did not rent the office on behalf of any specifically identified federal candidate.

" On Schedule H4, the Party's report listed a \$64 payment to The Storage Center on August 11, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for office storage rental. The Party did not rent the storage

ETEXT ATTACHMENT

space on behalf of any specifically identified federal candidate.

" On Schedule H4, the Party's report listed a \$3,850 payment to R&C Properties, LLC on August 16, 2004. The purpose of the disbursement was listed as a "Facility Rental." In response to the Commission's request, the Party has amended the purpose of disbursement to clarify that the payment was for an office rental. The Party did not rent the office on behalf of any specifically identified federal candidate.

Finally, the Commission requested a clarification of the terms "Consulting, Fundraising Expense, and Prof. Ser. - Administratio[n]," which the Party used to describe disbursements listed on Schedule B and Schedule H4 of its Amended September Monthly Report, filed on May 26, 2005. The Party's report listed eleven disbursements with these descriptions:

" A \$604.12 payment to Kivas Ristorante on August 26, 2004, for a "Fundraising Expense." The Party's amendment explains that the purpose of this disbursement was for "Food/Drink for Fundraiser." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$265 payment to Messinger Pictures on August 26, 2004, for a "Fundraising Expense." The Party's amendment explains that the purpose of this disbursement was for a "Photographer for Fundraiser." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$631.77 payment to Martha Belchic on August 26, 2004, for a "Fundraising Expense." The Party's amendment explains that the purpose of this disbursement was for "Food/Drink for Fundraiser." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$689.10 payment to Carlson Wagonlit Travel on August 9, 2004, for a "Fundraising Expense." The Party's amendment explains that the purpose of this disbursement was for

"Airfare/Fundraiser Speaker." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$1,552.48 payment to Louisiana Aircraft, Inc. on August 9, 2004, for a "Fundraising Expense." The Party's amendment explains that the purpose of this disbursement was for

"Airfare/Fundraiser Speaker." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$1,552.48 payment to Louisiana Aircraft, Inc. on August 26, 2004, for a "Fundraising Expense." The Party's amendment explains that the purpose of this disbursement was for "Airfare/Fundraiser Speaker." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$1,000 payment to Direct Mailing Services, Inc. on August 18, 2004, for "Consulting." The Party's amendment explains that the purpose of this disbursement was for "Strategy Consulting." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$415.25 payment to Scott Sewell on August 9, 2004, for a "Fundraising Expense." The Party's amendment explains that the purpose of this disbursement was for "Photography/Phone Expense for Fundraiser." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$675 payment to Connor Best on August 20, 2004, for a "Prof. Ser. - Administratio[n]." The Party's amendment explains that the purpose of this disbursement was for "clerical services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$557.50 payment to Jeanne Leveque on August 20, 2004, for a "Prof. Ser. - Administratio[n]." The Party's amendment

ETEXT ATTACHMENT

explains that the purpose of this disbursement was for "clerical services." This disbursement was not on behalf of any specifically identified federal candidate.

" A \$375 payment to Connor Best on August 26, 2004, for a "Prof. Ser. - Administratio[n]." The Party's amendment explains that the purpose of this disbursement was for "clerical services." This disbursement was not on behalf of any specifically identified federal candidate.

From June 8, 2005, through July 8, 2005, the Commission delivered a total of thirteen letters to the Party, each asking numerous specific questions about the Party's 2004 campaign finance disclosures. Eight of the letters listed deadlines for July 15, 2005. To date, the Party has filed eight report amendments in response to these inquiries. Although this reply does not address some of the issues raised by the Commission's July 15 letters, we have worked diligently to investigate each matter, and will continue to do so in order to ensure accurate reporting. Because of the Party's obligation to certify that each report is "true, correct and complete," it is inappropriate for the Party to submit additional amended reports at this time. The Party will submit necessary amendments in the coming days after concluding its investigation of questions raised by the Commission.

If you have questions or require additional information, please do not hesitate to contact me at (202) 756-8003.

Sincerely,

Bobby R. Burchfield
MCDERMOTT WILL & EMERY LLP
600 Thirteenth Street, N.W.
Washington, D.C. 20005-3096